

**Functional Series 500 – Management Services**  
**ADS 591 – Financial Audits of USAID Contractors, Grantees, and Host**  
**Government Entities**

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## **ADS 591 – Financial Audits of USAID Contractors, Grantees, and Host Government Entities**

**\*Asterisks indicate substantive revisions to the paragraph. An asterisk before the section header indicates the entire section has been substantively revised.**

### **591.1 OVERVIEW**

The purpose of this directive is to provide the policy and procedures for planning and conducting [financial audits](#) of USAID-funded contractors, grantees, and host government entities.

### **591.2 PRIMARY RESPONSIBILITIES**

- a. The Administrator is responsible for ensuring that management officials throughout USAID understand the value of the audit process and are responsive to audit recommendations.
- b. The USAID/Washington [Audit Management Officer \(AMO\)](#) is responsible for ensuring that required audits are conducted on foreign organizations receiving centrally funded awards when issued by their Bureau.
- c. The Mission Audit Management Officer (AMO) is responsible for developing and maintaining the Mission's audit inventory, and coordinating with the Regional Inspector General (RIG), Management Action Official, and other Mission officials to develop the Mission's Annual [Audit Plan](#).
- d. The [Management Control Review Committee \(MCRC\)](#) is responsible for serving as a decision-making body in situations involving audit issues, and monitoring the implementation and status of the Mission's Annual Audit Plan.
- e. The Mission Activity Manager is responsible for
  - Ensuring that all awards in their portfolio are included in the Mission's inventory;
  - Ensuring that adequate funding is made available for the required audits; and
  - Participating in developing an Annual Audit Plan for the activities managed.
- f. The Bureau for Management, Office of Management Planning and Innovation, Management Innovation and Control Division (M/MPI/MIC) is responsible for participating in the development and maintenance of USAID's audit management policies and procedures.

- g.** The Office of Inspector General (OIG) is responsible for
- Ensuring that financial audits meet auditing standards approved by the Comptroller General of the United States;
  - Providing technical advice and support to foreign [recipient](#) organizations, independent auditors (including auditors of host country [Supreme Audit Institutions](#)), and other financial assistance officials;
  - Providing or arranging for additional audit coverage of foreign organizations as requested by USAID;
  - Selectively performing [desk reviews](#) of financial [audit reports](#) to ensure quality and compliance with approved standards;
  - Working with recipients of USAID funds and independent auditors (including auditors of host country Supreme Audit Institutions) to effect appropriate corrective action for inadequate or substandard audit work;
  - Conducting [quality control reviews](#) of selected audits for which USAID is cognizant;
  - Conducting any audit of USAID organizations (foreign or U.S. based) as deemed necessary by the OIG; and
  - Participating in the development and maintenance of USAID's audit management policies and procedures.
- h.** The Bureau for Management, Office of Procurement, Procurement Support Division, Contract Audit Management Branch (M/OP/PS/CAM) is responsible for
- Identifying and maintaining the audit universe for U.S.-based organizations and ensuring required audits are conducted;
  - Identifying financial audit requirements and ensuring that audits are conducted of foreign organizations with centrally funded awards issued by M/OP;
  - Maintaining liaison with other Federal agencies cognizant for organizations doing business with USAID;
  - Providing technical advice and liaison to U.S. recipients, independent auditors, and other financial assistance officials; and
  - \*Maintaining the capability to perform requested pre-award reviews and other financial analysis as required.

- i. The Bureau for Management, Office of Procurement, Procurement Support Division, Overhead Special Costs and Closeout Branch (M/OP/PS/OCC) is responsible for negotiating and finalizing indirect cost rates for all U.S.-based organizations, and performing the close-out of all awards administered by USAID/Washington.

### **591.3 POLICY AND PROCEDURES**

#### **591.3.1 Audits of U.S. Organizations**

##### **591.3.1.1 Nonprofit Organizations**

U.S. [nonprofit organizations](#) that expend \$300,000 or more in Federal awards within their fiscal year must have a single or program-specific audit conducted for that year in accordance with OMB Circular A-133. The determination of when an award is expended is based on when the activity (for example, expense transaction or disbursement of funds) related to the award occurs. Guidance on determining Federal awards expended is provided in [OMB Circular A-133](#).

- a. Audits must be performed annually. A nonprofit organization that had biennial audits performed for periods ending between July 1, 1992, and January 1, 1995, may still have a biennial audit performed. These audits must cover both years within the biennial period.
- b. When an auditee expends Federal awards under only one Federal program (excluding research and development), and the Federal program's laws, regulations, or [grant](#) agreements do not require a financial audit, the auditee may elect to have a program-specific audit conducted in accordance with OMB Circular A-133.
- \*c. Prime recipients must ensure that their U.S. nonprofit [subrecipients](#) expending \$300,000 or more in Federal awards during their fiscal year are audited in accordance with OMB Circular A-133. USAID's legal relationship is with the prime recipient. Therefore, USAID is not responsible for directly monitoring subrecipients. A foreign organization that is only a subrecipient of a U.S. prime recipient is only subject to monitoring by that prime recipient in accordance with OMB Circular A-133 requirements. If the subrecipient is a U.S. for-profit organization, the prime must ensure its compliance with Section [591.3.1.2](#) of this ADS chapter.
- d. The independent auditor performing the audit of the primary recipient must determine whether the audit or monitoring requirements pertaining to subrecipients have been met.
- e. Organizations expending less than \$300,000 a year in Federal awards are exempt from OMB Circular A-133 audit requirements for that year, but records must be made available for review or audit upon request by USAID officials, prime recipients, or the General Accounting Office (GAO).

- f. Financial audits required by OMB Circular A-133 must be conducted in accordance with auditing standards approved by the Comptroller General of the U.S.
- g. Audits performed in accordance with OMB Circular A-133 do not limit the authority of USAID and the OIG to conduct or arrange for additional audits, reviews, and evaluations.
- h. OMB Circular A-133 audit reports must be submitted to the Federal Audit Clearinghouse within the earlier of 30 days after receipt of the auditor's report or nine months after the end of the audit period. The report must also be submitted to USAID when requested by the Office of Procurement (M/OP) or the OIG.
- i. Awards with U.S. nonprofit organizations must include a provision requiring the organizations to contract with an independent [non-Federal auditor](#) to perform audits in accordance with OMB Circular A-133, and include the USAID requirement for indirect cost rate information.
- j. M/OP/PS/OCC must use the information provided in the audit reports to negotiate indirect cost rate agreements.

**\*[Removed former section 591.5.2, Audits of U.S. State and Local Governments; OMB Circular A-128 was rescinded in June 1997; audits are now covered under OMB Circular A-133]**

#### **591.3.1.2 For-Profit Organizations**

[Incurred cost audits](#) must be performed annually of all U.S. for-profit organizations performing under direct contracts, grants, cooperative agreements, or cost-reimbursable host country contracts and subcontracts. The cognizant U.S. audit agency or an independent auditor will generally conduct these audits. The audits must be performed upon receipt of a final [incurred cost submission](#) from the organization. The Federal [cognizant agency](#) or independent auditor must audit the direct and indirect costs incurred under the awards to determine the allowable direct costs and recommend the indirect cost rates.

- \*a. In accordance with a Memorandum of Understanding (MOU) between the USAID OIG and the Defense Contract Audit Agency (DCAA), DCAA will perform the audits of U.S. for-profit firms for which USAID is cognizant. When DCAA cannot be responsive to USAID's needs, the OIG must contract with a non-Federal auditor or perform the audit with its own audit staff.
- b. The audits must be performed in accordance with a specific scope of work. The independent auditor is only legally accountable for the requirements contained in the scope of work.

- c. For annual incurred cost audits, the contractor must submit a final incurred cost submission to M/OP/PS/CAM reflecting actual cost experience during the period covered. M/OP/PS/CAM must forward the incurred cost submission and the audit request to DCAA and provide a copy to the OIG. The OIG provides DCAA with the billing number required to initiate the audit. The OIG must ensure that a copy of the audit report is provided to M/OP/PS/CAM and M/OP/PS/OCC.
- d. Annual incurred cost audits of non-USAID cognizant contractors are the responsibility of the cognizant agency.
- e. USAID must arrange for an audit of all host country contracts and subcontracts in excess of \$300,000 awarded to U.S.-based organizations. (See **591.3.4.1**)

## **591.3.2 Audits of Foreign Organizations and Host Government Entities**

### **591.3.2.1 Foreign Organizations**

Foreign nonprofit organizations that expend \$300,000 or more per their fiscal year in “USAID awards” (i.e., as recipients of USAID cost reimbursement awards or as subrecipients) and host governments that directly expend \$300,000 or more per their fiscal year under USAID grants must have an annual audit conducted in accordance with the requirements detailed in the [“Guidelines for Financial Audits Contracted by Foreign Recipients”](#) published by the OIG.

Foreign organizations that are subrecipients of a host government must be audited in accordance with the above Guidelines for Financial Audits.

Incurred cost audits must be performed annually of all foreign for-profit organizations performing under direct awards or cost-reimbursement host country contracts and subcontracts. Generally, DCAA or an independent auditor will perform the audit in accordance with a specific scope of work prepared by the USAID Mission and approved by the cognizant Regional Inspector General (RIG). The audits must be performed upon the receipt of a final incurred cost submission from the organization. The Federal cognizant agency or independent auditor must audit the direct and indirect costs incurred under the awards to determine the allowable direct costs and recommend the indirect cost rates.

\*a. Nonprofit organizations expending less than \$300,000 per their fiscal year under direct USAID cost reimbursement awards, and host governments expending less than \$300,000 per their fiscal year under USAID grants, are exempt from the above audit requirements. It is strongly recommended that Missions use the “Recipient Control Environment Assessment Checklist” to determine the level of monitoring necessary for these organizations. However, if the Mission determines that an audit must be performed, the audit report must be submitted to the cognizant RIG office for review and issuance. Records must be made available upon request by USAID officials, prime

recipients, or the GAO. (See Additional Help, [Recipient Control Environment Assessment Checklist](#))

b. Foreign organizations receiving centrally funded awards must have audits conducted in accordance with these requirements.

c. Audits performed by independent audit firms or by a government's Supreme Audit Institution must be in accordance with auditing standards approved by the Comptroller General of the U.S.

d. If a Mission determines that the capability to conduct an audit in accordance with the required standards is not available locally, and timely and economical audit services are not available through other means, the Mission must conduct a [financial review](#) that, to the maximum extent possible, meets the requirements of the "[Guidelines for Financial Audits Contracted by Foreign Recipients.](#)"

\*e. Foreign prime recipients are responsible for monitoring their subrecipients. The financial audit requirements outlined above must be imposed by the prime recipient on foreign subrecipients and U.S.-based organizations that are only subrecipients. A U.S.-based subrecipient that is also a prime recipient of USAID funds is covered by the requirements of OMB Circular A-133, but must still be monitored by the foreign prime recipient. USAID agreements must include provisions notifying organizations of their responsibility to establish a system for monitoring their subrecipients. USAID's legal relationship is with the prime recipient. Therefore, USAID is not responsible for directly monitoring subrecipients.

f. Contract/Grant Officers must ensure that audits of prime recipients conducted in accordance with this section are provided to the responsible RIG for desk review within the earlier of 30 days after receipt or nine months after the end of the fiscal year in which the expenditures were incurred. The RIG will establish recommendations for action, if appropriate, and provide copies of the audit reports to the responsible Contract/Grant Officer, M/MPI/MIC, and M/OP/PS/CAM. Subrecipients must submit copies of their audits to the prime recipient for review by their independent auditor as part of the prime's annual audit. If the independent auditor determines that required subrecipient audits are not being performed or are deficient or defective, a recommendation to have the audits performed or the deficient or defective issues corrected must be included in the audit report of the prime recipient.

g. Where host government organizations are unable to arrange for required audits, the responsible USAID Mission has the option of assisting in contracting for the audit services. The Mission also has the option of requesting the RIG to perform or supervise the audits. The RIG has the option of performing or supervising the audits at its discretion.

h. Cognizant Contract/Grant Officers must provide technical assistance to organizations and their independent auditors regarding recipient-contracted audit



requirements, including assistance in developing scopes of work for audits and approval of audit contracts.

- i. M/OP/PS/CAM must develop and maintain the audit inventory of foreign organizations receiving centrally funded awards. They must publish the “Centrally Funded Awards to Non-U.S. Based Recipients” quarterly report, and ensure that the information regarding audit requirements and audit reports is current.

### **591.3.2.2 Host Country-Owned Local Currency**

Local currency special accounts must be periodically audited. The audits must be professionally executed in accordance with generally accepted auditing standards and accounting principles prescribed by the host country’s laws, or that have been adopted by public accountants or associations of public accountants in the host country, together with generally accepted international auditing standards where feasible.

USAID Missions must discuss the requirements for auditing local currency special accounts with the host government. A Strategic Objective Agreement (SOAG) must contain specific language concerning audit responsibilities, frequency of audits, and funding. The SOAG must indicate that USAID audit rights cannot be subordinated or infringed by arrangements for audits by host country or independent auditors. The SOAG must also state whether host country or independent auditors will perform the audit, along with a determination of their competence and ability to conduct a professional audit. If the audit must be performed by the host government audit agency, a discussion of the agency’s ability to conduct an independent, fair, and impartial audit must be included.

\*The [Financial Audit Requirements Chart](#) contains summary information on the above sections and requirements in table format.

### **591.3.3 Other Audits/Surveys**

#### **\*591.3.3.1 Pre-Award Audits/Surveys**

A [pre-award audit](#) or survey must be requested before negotiating any contract or modification resulting from a proposal in excess of \$500,000 unless the Contracting Officer considers the information available sufficient to determine the reasonableness of the proposal or the financial responsibility of the organization. Pre-award audits for contracts or modifications resulting from proposals less than \$500,000 may be requested at the Contracting Officer’s discretion. For grants, a [pre-award survey](#) must be requested if the prospective recipient has not received a Federal award in the last five years or the Contract/Grant Officer or Cognizant Technical Officer (CTO) is uncertain about the organization’s capacity to perform technically or financially. M/OP/PS/CAM must determine whether pre-award audits or surveys of U.S. organizations are to be conducted. Pre-award audits and surveys are conducted by the cognizant audit agency, non-Federal resources, or other Federal auditors.

M/OP/PS/CAM direct-hire staff may conduct pre-award surveys and other financial reviews, but cannot perform pre-award audits conducted in accordance with standards approved by the Comptroller General of the U.S. Pre-award audits of foreign organizations' pricing proposals must be conducted by Federal or non-Federal auditors contracted by the RIGs or contracted by Bureaus and Missions in consultation with the RIGs.

#### **591.3.3.2 Close-Out Audits**

The need for a [close-out audit](#) must be determined by the Contract/Grant Officer after obtaining all necessary information, including a final voucher for expenditures incurred under an award. The Contract/Grant Officer must work with M/OP/PS/CAM and the OIG Financial Audits Division (IG/A/FA) or the cognizant RIG if it is determined that a close-out audit is required.

- a. As a general rule, annual incurred cost audits must be accepted as fulfilling the close-out audit requirements for U.S. and foreign for-profit organizations, and OMB Circular A-133 annual audits must be accepted as fulfilling the close-out audit requirement for U.S. nonprofit organizations. Annual audits in accordance with the "Guidelines for Financial Audits Contracted by Foreign Recipients" must be accepted as fulfilling the close-out audit requirements for foreign nonprofit organizations. The Contract/Grant Officer cannot proceed with the close-out process until [final action](#) has been taken on all audit recommendations. (See Mandatory References, [OMB Circular A-133](#) and [Guidelines for Financial Audits Contracted by Foreign Recipients](#))
- b. If a close-out audit is required for a U.S. organization, M/OP/PS/CAM must include a close-out audit request in the next regularly scheduled audit of the organization. If another Federal organization is cognizant, M/OP/PS/CAM must ask that organization's auditors to include the close-out audit work in the next regularly scheduled audit.
- c. If a close-out audit is required for a foreign organization, the Contract/Grant Officer must send a request to the cognizant RIG office, which must arrange for the audit.

#### **591.3.3.3 Contract Termination Claims**

When a contract is terminated for the convenience of the Government, the contractor must submit a settlement proposal to the Contracting Officer. Upon request by the Contracting Officer, M/OP/PS/CAM must coordinate an audit or perform a desk review of the proposal to determine its reasonableness and to prepare specific data for use in negotiating or determining a settlement. Audit reports must be used for negotiating a settlement and for issuing a unilateral determination. Contracting Officers are responsible for ensuring that settlements are properly justified, documented, and promptly executed.

**\*[Removed former section 591.5.14, Recipient Record Keeping Requirements; this information is available in [ADS 303](#), Grants and Cooperative Agreements to Non-Governmental Organizations; [22 CFR 226](#) for Assistance Agreements; and [FAR 4.7](#) and [FAR 9.104](#) for Acquisition Agreements]**

#### **591.3.4 Audit Planning and Monitoring**

##### **591.3.4.1 U.S. Contractors and Grantees**

M/OP/PS/CAM must ensure that required audits are conducted for U.S. contractors and grantees. M/OP/PS/CAM must maintain an inventory and tracking system for all U.S. contractors and grantees and ensure that audits include all direct and indirect costs.

- a. Missions must include all agreements with U.S. contractors and grantees, including fixed price contracts, fixed obligation grants, and cash transfer and nonproject assistance grants, in their audit inventories and confirm that they are included in the M/OP/PS/CAM audit inventory. Subrecipient agreements are not to be included in the audit inventory or annual audit plan.
- b. IG/A/FA must coordinate requests for audit support with the cognizant audit organization and keep the USAID Mission or Office informed.

##### **591.3.4.2 Foreign Contractors and Grantees**

USAID Missions, in consultation with the cognizant RIG, must ensure that required audits are conducted for foreign for-profit and nonprofit organizations and host government entities (including any Mission-funded activities in nonpresence countries), and local currency special accounts. M/OP/PS/CAM must maintain an inventory of foreign organizations receiving centrally funded contracts or grants issued by M/OP, including those in nonpresence countries, and ensure that required audits are conducted. Regional and central Bureaus must maintain an inventory of foreign organizations receiving centrally funded contracts or grants not issued by M/OP, including those in nonpresence countries, and ensure that required audits are conducted.

- a. Missions must maintain an inventory of all contracts, grants, and cooperative agreements, including cash transfer and nonproject assistance grants, awards financed with host country-owned local currency, and activities in nonpresence countries for use in determining audit requirements. Subrecipient agreements are not to be included in the inventory or annual audit plan. The following information must be included in the inventory listing:

- (1) Contractor/grantee name;
- (2) Type of organization (e.g., for-profit);
- (3) Award number, amount in U.S. dollars, and start/completion dates;
- (4) Prior audits and period covered;

- (5) Receipt date for required audits;
- (6) Dates for planned audits; and
- (7) Reason(s) for not including in the annual audit plan.

b. USAID Missions must develop an annual audit plan to ensure complete audit coverage of all direct awards to prime foreign organizations. The AMO must coordinate with the appropriate [activity managers](#) in developing the Mission's inventory and annual audit plan. Copies of the inventory and plan must be provided to the cognizant RIG and M/OP/PS/CAM.

\*c. Although activities in nonpresence countries, awards financed with host country-owned local currency, and cash transfer and nonproject assistance grants may not be subject to audit, they must be included in the inventory and considered for inclusion in the annual audit plan. The responsible Mission Controller is responsible for determining: (1) the feasibility of conducting audits on a case-by-case basis; and (2) the level of audit, if required, necessary to ensure appropriate accountability for these awards. The [Recipient Control Environment Assessment Checklist](#) can assist the Controller in making this determination.

\*d. Fixed price contracts and fixed obligation grants are not subject to the annual audit requirements detailed in Section [591.3.2.1](#) of this ADS chapter.

#### **591.3.5 Audit Funding**

Funding for financial audits is determined by the nature of the audit and the organization requiring the audit.

a. **U.S. For-Profit Organizations:** IG/A/FA must ensure that funds are available for financial audits of U.S. for-profit organizations performed by other Federal agencies such as DCAA or by independent public accountants. These audit costs are paid from OIG operating funds or program funds.

b. **U.S. Non-Profit Organizations:** Financial audits are normally funded by the recipient organization, and are eventually paid by USAID. The Contract/Grant Officer will determine if the cost of the audit is an allowable direct or indirect expense based on the applicable cost standards.

c. **Special Audit Requests:** Special audit requests initiated because of specific concerns about a contractor or grantee must be funded by the Mission or Bureau requesting the audit.

d. **Foreign Organizations and Host Government Entities:** Financial audits are normally funded by the recipient organization, and are eventually paid by USAID. The Contract/Grant Officer will determine if the cost of the audit is an allowable direct or indirect expense based on the applicable cost standards. USAID may, at its discretion,

perform audits of host government recipients and subrecipients using program funds or other sources.

e. **Local Currency Accounts:** Host country-owned local currency is the preferred source of funding for audits of local currency special accounts. While less preferable, appropriated dollar program funds are also permitted to be used for the audits. The Mission and the host government must agree on the funding source for these audits, which must be explicitly stated in the program agreement.

f. **Reimbursement to Cognizant Agencies:** Cognizant Federal audit agencies must be reimbursed for services rendered under formal or informal cross-servicing arrangements. The audit hourly rates for this work are established by DCAA. IG/A/FA must ensure that sufficient funds are available before scheduling these audits.

### **591.3.6 USAID Audit Rights**

USAID reserves the right to audit all aspects of program implementation, including contracts, grants, and cooperative agreements financed by the Agency. Individual Missions have the right to request audits of a subrecipient if the Mission determines that the potential for waste or fraud exists for that specific sub-agreement. These audits must be coordinated with the responsible prime recipient. USAID will exercise its audit rights by conducting audits with its own staff through the OIG, by requesting that audits be conducted by other Federal agencies such as DCAA, or by contracting with a CPA firm or equivalent to provide the services.

a. USAID retains the right to conduct a financial review, require an audit, or otherwise ensure adequate accountability of recipient organizations regardless of the audit requirement. Any additional financial reviews or audits must build on the work performed by other auditors. USAID agreements must include provisions for the right to conduct a financial review, when deemed necessary, or otherwise ensure adequate accountability of organizations expending USAID funds.

b. The OIG retains the authority to perform or supervise audits when requested by USAID or at its own discretion under the Agency-contracted audit program.

\*c. Nonprofit organizations expending less than \$300,000 per their fiscal year under direct USAID cost reimbursement awards, and host governments expending less than \$300,000 per their fiscal year under USAID grants, are not required to have an audit performed for that fiscal year. It is strongly recommended that Missions use the [Recipient Control Environment Assessment Checklist](#) to determine the level of monitoring necessary for these organizations. However, if the Mission determines that an audit must be performed, the audit report must be submitted to the cognizant RIG office for review and issuance.

### **591.3.7 Auditor Access to Recipient Records**

The Comptroller General of the United States, the USAID OIG, or any other duly authorized representative auditor must have access to any pertinent books, documents, papers, and records of the recipient and their subrecipients to make audits, examinations, excerpts, photocopies, and transcripts.

### **591.3.8 Noncompliance with Audit Requirements**

In cases of continued inability or unwillingness to have an audit performed in accordance with the terms of established provisions, USAID must consider appropriate sanctions, which may include the suspension of all or a percentage of disbursements until the audit is satisfactorily completed.

### **591.3.9 Reporting Restrictions**

Audit reports containing proprietary financial information are exempt from the Freedom of Information Act under 18 U.S.C. 1905. The following statement must appear on the report cover or face sheet of each report containing proprietary financial information: "Financial information contained in this report may be privileged. The restrictions of 18 U.S.C. 1905 must be considered before any information is released to the public." (See Mandatory Reference, [18 U.S.C. 1905](#))

### **591.3.10 Review and Issuance of Audit Reports**

Desk reviews must be performed for all financial audits of prime U.S. and foreign organizations prior to issuance of the reports by the OIG. In addition, quality control reviews must be conducted of selected audits. The OIG does not review and issue audits of subrecipients unless the audit has been performed at the request of USAID based on a determination that the potential for waste or fraud exists.

a. Following a required desk review, the cognizant OIG office prepares a memorandum that summarizes any findings and recommendations identified in the audits for official USAID tracking and action. The memorandum must clearly identify monetary and [procedural recommendations](#), or state that there are no recommendations. Monetary recommendations must be identified as [questioned costs](#) (ineligible and unsupported), or funds to be put to better use. A copy of the memorandum is provided to the applicable action office and M/MPI/MIC.

b. The OIG performs quality control reviews of selected financial audits to ensure that they were performed in accordance with OMB Circular A-133 or the Guidelines for Financial Audits Contracted by Foreign Recipients.

c. The OIG must notify the responsible Mission/Office, recipient organization, and non-Federal auditor when an audit does not meet the required standards. The OIG provides assistance to the non-Federal auditor to help correct the noted deficiencies.

d. USAID must withhold final payment for any work the OIG determines to be substandard until acceptable corrective action is taken.

**\*[Removed former sections 591.5.20, Management Decision on Audit Recommendations; 591.5.21, Final Action on Audit Recommendations; 591.5.22, Quarterly Report to the Deputy Administrator; 591.5.23, Consolidated Audit Tracking System (CATS); and 591.5.24, Evaluation of Staff Performance in Conducting Audit Follow-Up Responsibilities; this information is now in [ADS 595](#), Audit Management Program]**

#### **591.4 MANDATORY REFERENCES**

##### **591.4.1 External Mandatory References**

- a. [22 CFR 226](#)
- b. [FAR 33.211; 42.1; 42.3; 52.215-2; 52.216-7](#)
- c. [Inspector General Act of 1978, as amended](#)
- d. [OMB Circular A-133](#)
- e. [18 U.S.C. 1905](#)
- f. [41 U.S.C. 601-613](#)

##### **591.4.2 Internal Mandatory References**

- a. [ADS 590, Audit](#)
- b. [Guidelines for Financial Audits Contracted by Foreign Recipients](#)

#### **591.5 ADDITIONAL HELP**

- \*a.** [Financial Audit Requirements Chart](#)
- \*b.** [Recipient Control Environment Assessment Checklist](#)



## **591.6 DEFINITIONS**

The terms and definitions listed below have been included into the ADS Glossary. See the [ADS Glossary](#) for all ADS terms and definitions.

### **Activity Manager**

Member of a Strategic Objective (SO) Team or sub-team who is responsible for the day-to-day management of one or more specific activities. The Activity Manager is selected by the SO Team, and may or may not also have the delegated authorities of a Cognizant Technical Officer (CTO), whose authority to carry out contract management functions is designated by a Contracting or Agreement Officer. **(See “Cognizant Technical Officer (CTO)”)** (Chapters 200-203, 591, 592)

### **agency-contracted financial audit**

An audit of specific USAID-funded grants or contracts where the Office of Inspector General (OIG) manages non-Federal auditors and issues the resulting audit report. Non-Federal auditors are generally U.S. or U.S.-affiliated firms hired under OIG contracts. (Chapter 591)

### **\*Audit Management Officer (AMO)**

The individual designated to coordinate and monitor the overall audit program at the Mission, Bureau, or Independent Office level. (Chapters 591, 592, 593, 595)

### **\*audit plan**

An annual plan developed by USAID Missions, which outlines audit requirements for all foreign contractors and grantees. (Chapter 591)

### **\*audit report**

The completed report of the auditor containing the final findings, recommendations and, to the extent possible, comments and actions taken or planned by the management official. Audit reports include audits made by the Office of Inspector General, independent public accountants, Supreme Audit Institutions, other Government agencies, such as the Defense Contract Audit Agency (DCAA), and the U.S. General Accounting Office (GAO). (Chapters 591, 592, 595)

### **close-out audit**

The final audit report to be submitted upon completion or termination of a cost-reimbursable, time and material type contract, grant, or cooperative agreement. (Chapter 591)

### **cognizant agency**

The Government agency with primary audit responsibility for a particular contractor or grantee. (Chapter 591)



**\*desk review**

A limited review of a financial audit report to determine whether the report contains all the required elements and appears to be accurate and logical. (Chapters 590, 591, 595)

**\*final action**

The completion of all actions that USAID management has concluded, in management decisions, are necessary with respect to the findings and recommendations included in an audit report. (Chapters 591, 595)

**financial audit**

An audit to assess whether a recipient (contractor, grantee, or host government) has accounted for and used USAID funds as intended and in compliance with applicable laws and regulations. (Chapters 591, 595)

**\*financial review**

A review of a USAID-funded organization's financial policies, procedures, systems, and controls. This review is not conducted in accordance with standards approved by the Comptroller General of the U.S. (Chapter 591)

**grant**

A legal instrument used where the principal purpose is the transfer of money, property, services, or anything of value to the recipient in order to accomplish a public purpose of support or stimulation authorized by Federal statute and where substantial involvement by USAID is not anticipated. (Chapters 304, 591, 595)

**\*incurred cost audit**

An annual audit of costs incurred under cost reimbursable contracts to determine allowability, allocability, and reasonableness of costs. This audit is conducted in accordance with standards approved by the Comptroller General of the U.S. (Chapter 591)

**incurred cost submission**

Required by the Federal Acquisition Regulation's "Allowable Cost and Payment" clause; a submission due 90 days after the close of the contractor's fiscal year which is used as the basis for conducting an incurred cost audit. (Chapter 591)

**\*Management Control Review Committee (MCRC)**

For financial audits, a group of USAID managers, normally at the Mission level, who provide oversight and assistance regarding audit issues and monitor the Mission audit plan. (Chapter 591)

**non-Federal auditor**

A Certified Public Accountant (CPA) (or equivalent) operating as a sole practitioner, or a CPA (or equivalent) firm. (Chapter 591)

**nonprofit organization**

Any corporation, trust, association, cooperative, or other organization that is operated primarily for service, charitable, scientific, educational, or other similar purposes; is not organized for profit; and uses its net proceeds to maintain, improve, and/or expand its operations. (Chapter 591)

**\*pre-award audit**

An advisory audit conducted on pending awards to determine the reasonableness, allowability, and allocability of proposed costs. This audit is conducted in accordance with standards approved by the Comptroller General of the U.S. (Chapter 591)

**\*pre-award survey**

An evaluation of a prospective recipient's ability to perform under a Government sponsored agreement. Such surveys are normally limited to assessing the adequacy of the recipient's accounting system to accumulate cost information under an agreement and/or the financial capability to perform under a prospective award. Surveys may also encompass technical, production, and quality assurance considerations. This survey is not conducted in accordance with standards approved by the Comptroller General of the U.S. (Chapter 591)

**\*procedural recommendation**

A recommendation type that involves nonmonetary corrective actions. (Chapters 591, 595)

**\*quality control review**

A review of the working papers supporting an audit report prepared by non-Federal auditors to ensure that the work complies with auditing standards approved by the Comptroller General of the United States. (Chapters 590, 591)

**\*questioned costs**

Costs determined to be potentially unallowable. It includes *ineligible costs* (violation of a law, regulation, contract, grant, cooperative agreement, etc., or an unnecessary or unreasonable expenditure of funds) and *unsupported costs* (those not supported by adequate documentation at the time of the audit). (Chapters 591, 595)

**\*recipient**

An organization receiving financial assistance directly from USAID to carry out a program under a grant or cooperative agreement. The term includes public and private institutions of higher education, public and private hospitals, and other quasi-public and private nonprofit organizations. The term may also apply to profit-making organizations that are performing work under a grant or cooperative agreement relationship with USAID. (Chapters 591, 636)

**recipient-contracted financial audit**

A periodic audit of a nonprofit organization receiving USAID funding, in which the auditee hires non-Federal auditors to perform the audit and the Office of Inspector

General is responsible for maintaining quality control over the resulting audit field work and report. U.S.-based organization audits follow the rules and procedures contained in OMB Circular A-133 (generally called “A-133 audits”), while foreign organization audits follow the rules and procedures contained in the USAID-produced “Guidelines for Financial Audits Contracted by Foreign Recipients” dated July 1998 (generally called “recipient-contracted audits”). (Chapter 591)

**subrecipient**

Any person or government department, agency, establishment, or nonprofit organization that receives financial assistance to carry out a program through a primary recipient or other subrecipient. (Chapter 591)

**\*Supreme Audit Institution**

A foreign country’s principal government audit agency, often referred to as its “Supreme Audit Institution” (SAI). (Chapters 590, 591)

**termination claims**

Claims for compensation of costs incurred when a contract is terminated for default or the convenience of the Government. (Chapter 591)

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